

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UMG RECORDINGS, INC., CAPITOL RECORDS, LLC, SONY MUSIC ENTERTAINMENT, ARISTA MUSIC, ARISTA RECORDS LLC, ATLANTIC RECORDING CORPORATION, RHINO ENTERTAINMENT COMPANY, WARNER MUSIC INC., WARNER MUSIC INTERNATIONAL SERVICES LIMITED, WARNER RECORDS INC., WARNER RECORDS LLC, and WARNER RECORDS/SIRE VENTURES LLC,

Plaintiffs,

vs.

UNCHARTED LABS, INC., d/b/a Udio.com,
and JOHN DOES 1-10,

Defendant.

Case No. 1:24-cv-04777 (AKH)

NOTICE OF MOTION TO FILE
REDACTED EXHIBIT RE:
PLAINTIFFS' MOTION TO COMPEL

Pursuant to Rule 4(B)(i) of this Court's Individual Rules Plaintiffs hereby submit this notice of motion to file a redacted version of Exhibit J associated with Plaintiffs' motion to compel on the public docket. Exhibit J contains information that has been designated as "Highly Confidential – Attorneys' Eyes Only" by Defendant Uncharted Labs, Inc., d/b/a Udio ("Udio") under the operative Protective Order. *See* Dkt. 67. Accordingly, Plaintiffs seek leave to file such designated material under seal to provide Udio an opportunity to file with the Court a statement of the reasons that such material shall be filed under seal. *See id.* ¶ 20 ("Within five business days of the filing of the motion to seal, the Designating Party will file with the Court a statement of reasons that the confidential material should be sealed that complies with Paragraph 4(B) of this Court's Individual Practices").

Plaintiffs expressly reserve the right to object to Udio's sealing some or all of the designated material.

Dated: February 18, 2025

Respectfully submitted,

By: 

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